



California Regional Water Quality Control Board

Los Angeles Region



Alan C. Lloyd, Ph.D.
Agency Secretary

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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Arnold Schwarzenegger
Governor

March 24, 2006

Mr. Robert Asgian
County Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90607-4998

Dear Mr. Asgian:

WASTE DISCHARGE REQUIREMENTS – PUENTE HILLS LANDFILL, WHITTIER, CA (FILE NO. 57-220)

Reference is made to our letter dated January 31, 2006, regarding the proposed amending of the Waste Discharge Requirements (Regional Board Order No. 90-046, adopted March 26, 1990, Order No. 91-035, adopted March 4, 1991, Order No. 93-070, adopted November 1, 1993, Order No. 94-103, adopted September 26, 1994, and Order No. 99-059, adopted March 26, 1999) for the Puente Hills Landfill (Landfill). The tentative Waste Discharge Requirements (WDRs) were originally released for public comment on August 31, 2005. As you know, comments were received from the County Sanitation Districts of Los Angeles County (Discharger) clarifying a variety of requirements contained in the tentative WDRs and from Ms. Toni Stein regarding the acceptance of incinerator ash for disposal at the Landfill. Subsequently, the Discharger and Ms. Stein have forwarded additional comments regarding incinerator ash acceptance (see Attachment 1). Regional Board staff has responded to the comments (see Attachment 2) and have revised the tentative WDRs. An electronic copy of the revised tentative WDRS can be accessed at http://www.swrcb.ca.gov/rwqcb4/html/permits/all_tentative_permits.html. A hard copy of these tentative requirements can be furnished upon request.

You are reminded that the public meeting will be held on April 6, 2006, beginning at 9:00 a.m., at the Department of Water and Power, Board Room 1555A, 111 N. Hope Street, Los Angeles, CA 90012.

If you have any questions, please call Enrique Casas at (213) 620-2299 or me at (213) 620-6119.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations

Mr. Robert Asgian

- 2 -

March 24, 2006

Sincerely,

Rodney Nelson
Senior Engineering Geologist
Land Disposal Unit

cc: Mailing List

California Environmental Protection Agency



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Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations

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1001 "I" Street
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Honorable Hilda L. Solis
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Menlo Park, CA 94025

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ATTACHMENT 1
COMMENTS RECEIVED
FOR
PUENTE HILLS LANDFILL
REVISED WASTE DISCHARGE REQUIREMENTS
FOR
WASTE DISPOSAL, ASSESSMENT MONITORING PROGRAM, AND
CORRECTIVE ACTION PROGRAM

COMMENTS RECEIVED FROM:

- 1) County Sanitation Districts of Los Angeles County (comments received 2/23/06).
- 2) Antoinette "Toni" Stein, PhD, 800 Magnolia Street, Menlo Park, CA 94025 (comments forwarded on 3/8/06 via email after the formal comment period but included herein as a restatement of comments initially received on 10/12/05).
- 3) County Sanitation Districts of Los Angeles County (received 3/17/06 after the formal comment period but included herein because they respond directly to concerns raised by Toni Stein in her 3/8/06 comments).

1)

County Sanitation Districts of Los Angeles County
(received 2/23/06)



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

JAMES F. STAHL
Chief Engineer and General Manager

February 23, 2006
File No. 31R-109.10

Dr. Enrique Casas
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Dr. Casas:

Puente Hills Landfill Tentative Waste Discharge Requirements

On August 31, 2005, the California Regional Water Quality Control Board – Los Angeles Region (RWQCB) issued tentative Waste Discharge Requirements (WDR) for the Puente Hills Landfill. Per our conversation, the Sanitation Districts of Los Angeles County (Sanitation Districts) request WDR Finding No. 64 be modified to reflect that metals concentrations for Commerce Refuse-to-Energy Facility (CREA) and Southeast Resource Recovery Facility (SERRF) treated ash wastes do not exceed California Code of Regulations Title 22 solubility threshold limits. These limits are used to determine whether a waste is classified as non-hazardous waste or not. Title 22, Section 66261.20 specifies that the appropriate methodology for this determination is provided in SW-846, which is a guidance manual written by the United States Environmental Protection Agency. SW-846 states that constituents with a 90% upper confidence level below the regulatory thresholds are considered non-hazardous. As described in the Sanitation Districts' February 6, 2006 letter, metals concentrations for CREF and SERRF are below these regulatory limits. Accordingly, the Sanitation Districts respectfully request WDR Finding No. 64 be modified to avoid potential confusion regarding these regulations.

Should you have any questions concerning this request, please do not hesitate to contact me at the above listed telephone number, extension 2412.

Very truly yours,

James F. Stahl

David L. Rothbart
Supervising Engineer
Technical Services Department

DLR:CJH:dhs

2)

Antoinette "Toni" Stein, PhD, 800 Magnolia Street,
Menlo Park, CA 94025

(comments forwarded on 3/8/06 via email)

From: "Toni Stein" <tweil@igc.org>
To: "Rothbart, David" <DRothbart@lacsds.org>
Date: 3/8/2006 12:17:04 AM
Subject: PH WDR and MRPs for ash

David:

Attached is a mark up of your draft letter from 1/31/06. I have marked it up. Please review. The intent is to discuss these and resolve the issues you may find in the mark up in an effort to move these provisions to be added to the tentative WDR and MRPs.

After you review, please let me know if you are available to discuss these perhaps later this week? Best time for me is between 9:15 and 10:30 most days. Thank you for your continued consideration of these issues.

Best,
Toni Stein

Antoinette "Toni" Stein, PhD
800 Magnolia Street
Menlo Park, CA 94025

cell: 650-823-7662
tweil@igc.org

CC: "Enrique Casas" <ecasas@waterboards.ca.gov>, <DcapJane@aol.com>

March 8, 2006~~January 31, 2006~~

File: 31R-109.10

Mr. Rodney Nelson
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Mr. Nelson:

Puente Hills Landfill
Tentative Waste Discharge Requirements

On August 31, 2005, the California Regional Water Quality Control Board – Los Angeles Region (RWQCB) issued tentative Waste Discharge Requirements and Monitoring and Reporting Program for the Puente Hills Landfill. On October 12, 2005 the RWQCB received comments on the tentative requirements from the County Sanitation Districts of Los Angeles County (Sanitation Districts) and from Ms. Antoinette Stein. Ms. Stein's comments are related to the acceptance of treated incinerator ash at the landfill.

~~Through discussions between Ms. Stein and The staff from the Sanitation Districts, Ms. Stein's concerns as detailed in her October 12, 2005 letter have been fully addressed subject to~~proposes the inclusion of the following supplemental conditions into the Waste Discharge Requirements and Monitoring and Reporting Program for the Puente Hills Landfill to address Stein's concerns raised in her October 12, 2005 letter:

1. Treated ash will be placed over lined areas of the Puente Hills Landfill to the maximum extent possible. A map depicting the area in the landfill where the treated ash was deposited will be included in semi-annual reports.
2. ~~(combine with #4 below)~~ Treated ash shall be sampled and analyzed semi-annually for TTL~~total metals~~to comply with 22 CCR s 66261.24. ~~The TTL~~total metals analysis shall be for treated ash samples collected from both the Commerce Refuse-to-Energy Facility (Commerce) located in Commerce, California and from the Southeast Resource Recovery Facility (SERRF) located in Long Beach, California. The ash ~~Metals~~ analyzed shall be analyzed for ~~include~~ all of the compounds required in 22 CCR s 66261.24

including metals and compounds of cadmium, copper, lead and zinc, mercury, chromium (and chromium III and VI compounds), cobalt, nickel, , silver, selenium, arsenic, antimony, barium, beryllium, thallium, vanadium. (see complete list in 22 CCR s 66261.24) -

3. Dust suppression measures shall be employed to minimize the generation of dust during the ~~acceptance~~ unloading of treated ash and when the ash is moved, carried, crushed, or mechanically worked including during of treated ash and winter deck construction activities.
4. ~~Per 22 CCR s 66262.11, the Treated ash from Commerce and SERRF shall be sampled and analyzed, and reported -for monitoring on a quarterly basis every three years to determine if the waste is a hazardous waste using the following methods: Toxicity Characteristic Leaching Procedure (TCLP), test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, the Waste Extraction Tests (WET) (STLC) and (TTLC) for total and soluble for all of the compounds listed in 22 CCR s 66261.24 (TTLC, STLC and TCLP testing) including metals and compounds of cadmium, copper, lead and zinc, mercury, chromium (and chromium III and VI compounds), cobalt, nickel, , silver, selenium, arsenic, antimony, barium, beryllium, thallium, vanadium. (see complete list in 22 CCR s 66261.24) supplemental metals. Supplemental metals to be analyzed shall include: mercury, ?, ?, and ?. In the event that confirmed detections are three standard deviations below the greater than 50% of respective Soluble Threshold Limit Concentrations (STLC), Total Threshold Concentration Limit (TTLC) or Toxicity Characteristic Leaching Procedure (TCLP) levels listed in as described in Title 22, Section 66261.24 and 40 CFR Section 261.24, such respective constituents shall be for three consecutive -monitored periods then the monitoring for that compound may be discontinued quarterly thereafter for three years. Supplemental testing shall be performed commencing within 60-days following adoption of this Order.~~
5. ~~Immediately upon treatment, treated Aash from Commerce and SERRF shall be sampled and analyzed in accordance with TCLP, Test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846. The subject TCLP testing shall be conducted annually for the compounds listed in 40 CFR Section 261.24 including following metals: cadmium, copper, lead and zinc. mercury, chromium, silver, selenium, arsenic see full list in 40 CFR Section 261.24.~~
6. Ash that tests above the STLC, TTLC or TCLP test thresholds shall not be disposed in the Puente Hills Landfill.

~~Ms. Stein agrees and acknowledges that the commitment to implement the above listed conditions adequately addresses her comments and concerns as expressed in her October 12, 2005 letter to the RWQCB. Ms. Stein and the Sanitation Districts respectfully request that the RWQCB incorporate the conditions listed above into the Waste Discharge Requirements and Monitoring and Reporting Program for the Puente Hills Landfill. Should you have any questions concerning this transmittal, please do not hesitate to contact Mr. David Rothbart of this office at the above listed telephone number, extension 2412.~~

Antoinette Stein

Date

James F. Stahl,
Chief Engineer and General Manager
County Sanitation Districts of Los Angeles County

Date

JFS:DLR:dhs

3)

County Sanitation Districts of Los Angeles County
(comments forwarded on 3/17/06 via email)

From: "Rothbart, David" <DRothbart@lacsds.org>
To: "Rod Nelson (E-mail)" <RNELSON@waterboards.ca.gov>
Date: 3/17/2006 9:56:03 AM
Subject: Puente Hills Landfill - Waste Discharge Requirements

Rod,

Per our discussion, the attached letter provides proposed supplemental provisions to the tentative WDR. As described in the letter, treated incinerator ash accepted at the Puente Hills Landfill is non-hazardous and will not impact groundwater. Nevertheless, as suggested by RWQCB staff, the Sanitation Districts propose the inclusion of supplemental provisions into the WDR to address Ms. Stein's concerns. Please let me know if you have any questions regarding this transmittal.

Thanks and have a great weekend,

David

David L. Rothbart, P.E.
Supervising Engineer
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Telephone: (562) 699-7411, ext. 2412
FAX: (562) 692-2941
<<Puente Hills Landfill Tentative WDR Letter.PDF>>

CC: "Enrique Casas (E-mail)" <ecasas@waterboards.ca.gov>, "Toni Stein (E-mail)" <tweil@igc.org>, "Asgian, Robert" <RAsgian@lacsds.org>



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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JAMES F. STAHL
Chief Engineer and General Manager

March 17, 2006
File: 31R-109.10

Mr. Rodney Nelson
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Mr. Nelson:

Puente Hills Landfill Tentative Waste Discharge Requirements

On August 31, 2005, the California Regional Water Quality Control Board – Los Angeles Region (RWQCB) issued tentative Waste Discharge Requirements and Monitoring and Reporting Program for the Puente Hills Landfill. On October 12, 2005 the RWQCB received comments on the tentative requirements from the County Sanitation Districts of Los Angeles County (Sanitation Districts) and from Ms. Antoinette Stein. Ms. Stein's comments related to the acceptance of treated incinerator ash at the landfill.

As discussed in the Sanitation Districts' February 6, 2006 letter, treated incinerator ash accepted at the Puente Hills Landfill is non-hazardous and will not impact groundwater. Nevertheless, as suggested by RWQCB staff, the Sanitation Districts propose the inclusion of the following supplemental provisions into the Waste Discharge Requirements and Monitoring and Reporting Program for the Puente Hills Landfill to address the concerns raised by Ms. Stein in her October 12, 2005 letter:

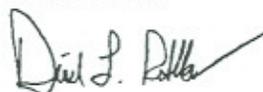
1. Treated ash will be placed over lined areas of the Puente Hills Landfill to the maximum extent possible. A map depicting the area where treated ash was deposited shall be included in semi-annual reports.
2. Dust suppression measures shall be employed to minimize potential dust generation during the unloading of treated ash and during any construction activities utilizing treated ash.

3. Within 60-days from the adoption of this Order, treated ash from the Commerce Refuse to Energy Facility (Commerce) located in Commerce, California and from the Southeast Resource Recovery Facility (SERRF) located in Long Beach, California shall be sampled and analyzed for non-organic and non-volatile constituents specified in the California Code of Regulations (CCR), Title 22, Section 66261.24 (potential organic and volatile constituents are removed by the incineration process). This screening test shall be in accordance with the Toxicity Characteristic Leaching Procedure (TCLP), Test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846 and 22 CCR, Section 66261.24 for total and soluble constituents. A technical report containing results from this screening test shall be provided for RWQCB review 30-days after final laboratory results are received. Based upon a review of the technical report, the RWQCB may require additional constituents for routine sampling and analysis.
4. Treated ash from the Commerce and SERRF shall be sampled and analyzed every five years for non-organic and non-volatile constituents specified in CCR, Title 22, Section 66261.24. Testing shall be in accordance with the Toxicity Characteristic Leaching Procedure (TCLP), Test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846 and 22 CCR, Section 66261.24 for total and soluble constituents.
5. Treated ash not in conformance with the requirements in 22 CCR, Section 66261.24 or 40 CFR Section 261.24 shall not be disposed at the Puente Hills Landfill.

If you have any questions regarding this transmittal, please do not hesitate to contact me at the above-listed telephone number, extension 2412.

Very truly yours,

James F. Stahl



David L. Rothbart
Supervising Engineer
Technical Services Department

DLR:dhs

cc: Ms. Antoinette Stein

ATTACHMENT 2
COMMENTS RECEIVED
FOR
PUENTE HILLS LANDFILL
REVISED WASTE DISCHARGE REQUIREMENTS
FOR
WASTE DISPOSAL, ASSESSMENT MONITORING PROGRAM, AND
CORRECTIVE ACTION PROGRAM

- 1) County Sanitation Districts of Los Angeles County (comments received 2/23/06).
- 2) Antoinette "Toni" Stein, PhD, 800 Magnolia Street, Menlo Park, CA 94025 (comments forwarded on 3/8/06 via email after the formal comment period but included herein as a restatement of comments initially received on 10/12/05).
- 3) County Sanitation Districts of Los Angeles County (received 3/17/06 after the formal comment period but included herein because they respond directly to concerns raised by Toni Stein in her 3/8/06 comments).

1)

County Sanitation Districts of Los Angeles County
(received 2/23/06)

Comment No. 1, Finding No. 64:

On August 31, 2005, the California Regional Water Quality Control Board – Los Angeles Region (RWQCB) issued Waste Discharge Requirements (WDR) for the Puente Hills Landfill. Per our conversation, the Sanitation Districts of Los Angeles County (Sanitation Districts) request WDR Finding No. 64 be modified to reflect that metals concentrations for Commerce Refuse-to-Energy Facility (CREA) and Southeast Resource Recovery Facility (SERRF) treated ash wastes do not exceed California Code of Regulations Title 22 solubility threshold limits. These limits are used to determine whether a waste is classified as non-hazardous waste or not. Title 22, Section 66261.20 specifies that the appropriate United States Environmental Protection Agency SW-846, states that constituents with a 90% upper confidence level below the regulatory thresholds are considered non-hazardous. As described in the Sanitation Districts' February 6, 2006 letter, metals concentrations for CREF and SERRF are below these regulatory limits. Accordingly, the Sanitation Districts respectfully request WDR Finding No. 64 be modified to avoid potential confusion regarding these regulations.

Response:

Finding No. 64 clearly indicates that acceptance of incinerator ash at the Landfill is dependant on whether DTSC determines that the waste must be managed as hazardous waste, which is not the case at this time. To indicate that test results above title 22 CCR solubility threshold limits are not a statistical representation and that the ash acceptance has not resulted in exceedances of applicable water quality objectives the Finding has been modified in an attempt to eliminate any confusion as follows:

*However, ~~some~~ **some individual test results for** heavy metal ~~concentrations~~ for the CREF and/or SERRF ash wastes have exceeded title 22 of the CCR solubility threshold limits. Because of this, the long-term disposal of ash ~~may~~ **has the potential to** not be in conformance with applicable water quality objectives.*

As explained further in the Finding, the potential to not be in conformance with applicable water quality objectives is the reason for stringent waste characterization testing included in M&RP No. CI-2294.

2)

Antoinette "Toni" Stein, PhD, 800 Magnolia Street,
Menlo Park, CA 94025

(comments forwarded on 3/8/06 via email)

1. Treated ash will be placed over lined areas of the Puente Hills Landfill to the maximum extent possible. A map depicting the area in the landfill where the treated ash was deposited will be included in semi-annual reports.

Response:

Though requirements in existing State Board or Regional Board orders or title 27 of the California Code of Regulations do not limit the disposal of incinerator ash to lined areas, as indicated in Responses to Comments #5 below, the Sanitation District accept the responsibility to attempt future disposal in lined area to the maximum extent practicable. Thus the proposed provision as suggested has been added to the tentative Order.

2. (combine with #4 below)

Treated ash shall be sampled and analyzed semi-annually for TTLC to comply with 22 CCR s 66261.24. the TTLC analysis shall be for treated ash samples collected from both the Commerce Refuse-to-Energy Facility (Commerce) located in Commerce, California and from the Southeast Resource Recovery Facility (SERRF) located in Long Beach, California. The ash shall be analyzed for all of the compounds required in 22 CCR s 66261.24 including metals and compounds of cadmium, copper, lead and zinc, mercury, chromium (and chromium III and VI compounds), cobalt, nickel, , silver, selenium, arsenic, antimony, barium, beryllium, thallium, vanadium. (see complete list in 22 CCR s 66261.24)

Response:

As indicated in Finding No. 64 of the tentative Order, long-term acceptance of incinerator ash acceptance at the Landfill has the potential to not be in conformance with applicable water quality objectives. As such, incinerator ash characterization included in M&RP No. 2299 is warranted to better evaluate potential contaminants from the incinerator ash. As indicated in Responses to Comments #5 below, the Sanitation Districts accepts implementing a responsive program of incinerator ash characterization for state and federal testing requirements. This testing includes a sampling event within 60-days from the adoption of this Order as well as every five years thereafter. The proposed testing has been added to the tentative Order but revised to eliminate organic and volatile constituents that would be eliminated by the incineration process.

3. Dust suppression measures shall be employed to minimize the generation of dust during the unloading of treated ash and when the ash is moved, carried, crushed, or mechanically worked including during winter deck construction activities.

Response:

As indicated in Responses to Comments #5 below, the Sanitation District accepts the responsibility to implement diligent dust suppression measures during the disposal,

stockpiling, and reuse operations for incinerator ash. Thus the proposed provision as suggested has been added to the tentative Order.

4. Per 22 CCR s 66262.11, the ash from Commerce and SERRF shall be sampled and analyzed, and reported for monitoring on a quarterly basis to determine if the waste is a hazardous waste using the following methods: Toxicity Characteristic Leaching Procedure (TCLP), test Method 1311 in “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” EPA Publication SW-846, the Waste Extraction Tests (WET) (STLC) and (TTLC) for all of the compounds listed in 22 CCR s 66261.24 (TTLC, STLC and TCLP testing) including metals and compounds of cadmium, copper, lead and zinc, mercury, chromium (and chromium III and VI compounds), cobalt, nickel, silver, selenium, arsenic, antimony, barium, beryllium, thallium, vanadium. (see complete list in 22 CCR s 66261.24) In the event that detections are three standard deviations below the respective Threshold Limit Concentrations levels listed in Title 22, for three consecutive monitored periods then the monitoring for that compound may be discontinued thereafter for three years. Testing shall be performed commencing within 60-days following adoption of this Order.

Response:

See response to Item No. 2 above. As indicated in Item No. 2, incinerator ash characterization included in M&RP No. 2299 is warranted to better evaluate potential contaminants from the ash. However, the characterization is to better evaluate conformance with applicable water quality objectives rather than “determine if the waste is a hazardous waste” which is the purview of the California Department of Toxics Substance Control.

5. Ash from Commerce and SERRF shall be sampled and analyzed in accordance with TCLP, Test Method 1311 in “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” EPA Publication SW-846. The subject TCLP testing shall be conducted annually for the compounds listed in 40 CFR Section 261.24 including: cadmium, copper, lead and zinc, mercury, chromium, silver, selenium, arsenic see full list in 40 CFR Section 261.24.

Response:

See response to Item No. 2 above.

6. Ash that tests above the STLC, TTLC or TCLP test thresholds shall not be disposed in the Puente Hills Landfill.

Response:

As indicated in Responses to Comments #5 below, the Sanitation Districts concurs that incinerator ash that exceeds regulatory limits for classification as hazardous waste should

not be accepted at the Landfill. The proposed provision has been added to the tentative Order but revised to be consistent with state and federal regulatory requirements.

3)

County Sanitation Districts of Los Angeles County
(comments forwarded on 3/17/06 via email)

As discussed in the Sanitation Districts' February 6, 2006 letter, treated incinerator ash accepted at the Puente Hills Landfill is non-hazardous and will not impact groundwater. Nevertheless, as suggested by RWQCB staff, the Sanitation Districts propose the inclusion of the following supplemental provisions into the Waste Discharge Requirements and Monitoring and Reporting Program for the Puente Hills Landfill to address the concerns raised by Ms. Stein in her October 12, 2005 letter:

1. Treated ash will be placed over lined areas of the Puente Hills Landfill to the maximum extent possible. A map depicting the area where treated ash was deposited will be included in semi-annual reports.
2. Dust suppression measures shall be employed to minimize potential dust generation during the unloading of treated ash and during any construction activities utilizing treated ash.
3. Within 60-day from the adoption of this Order, treated ash from the Commerce Refuse to Energy Facility (Commerce) located in Commerce, California and from the Southeast Resource Recovery Facility (SERRF) located in Long Beach, California shall be sampled and analyzed for non-organic and non-volatile constituents specified in the California Code of Regulations (CCR), Title 22, Section 66261.24 (potential organic and volatile constituents are removed by the incineration process). This screening test shall be in accordance with Toxicity Characteristic Leaching Procedure (TCLP), Test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846 and 22 CCR, Section 66261.24 for total and soluble constituents. A technical report containing results from this screening test shall be provided for RWQCB review 30-days after final laboratory results are received. Based upon a review of the technical report, the RWQCB may require additional constituents for routine sampling and analysis.
4. Treated ash from the Commerce and SERRF shall be sampled and analyzed every five years for non-organic and non-volatile constituents specified in CCR, Title 22, Section 66261.24. Testing shall be in accordance with the Toxicity Characteristic Leaching Procedure (TCLP), Test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846 and 22 CCR, Section 66261.24 for total and soluble constituents.
5. Treated ash not in conformance with the requirements in 22 CCR, Section 66261.24 or 40 CFR Section 261.24 shall not be disposed at the Puente Hills Landfill.

Response:

As indicated in Responses to Comments No. 4 above, expanded incinerator ash disposal and testing procedures to better evaluate and limit any potential exceedances of applicable water quality objectives is warranted. The provisions proposed by the Sanitation Districts that consider the concerns raised by Ms. Toni Stein have been added to the tentative Order.